

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of		
		WT Docket 05-235
Amendment of Part 97 of the		
Commission's Amateur		
Service Rules		

To: The Federal Communications Commission:

COMMENTS OF: Donald E. Dallmann, K9VIC

I. THIS COMMENTER

These are the comments of Donald E. Dallmann regarding the FCC's Notice of Proposed Rulemaking, WT Docket No. 05-235. This commenter currently holds an amateur extra class license (call sign K9VIC), and has been licensed for approximately 6 years. This commenter is currently active on all HF bands using primarily digital communication modes, and is somewhat active on VHF and UHF FM.

II. INTRODUCTION

The subject *Notice of Proposed Rulemaking (Notice)* proposes to eliminate the 5-WPM Morse code testing requirements for all classes of amateur license. Elimination of Morse code testing should allow for current and future licensees to enjoy HF privileges without the burden of a Morse code examination. The proposed changes will undoubtedly bring growth to the amateur radio community, but fall short on one count. The HF privileges granted to General and Extra class licensees include CW/Data sub-bands, sub-bands the no-code licensees apparently do not intend on using as they haven't mastered Morse code even at the 5-WPM level. A simple restructuring of the licensing process, with elimination of Morse code requirements to gain HF phone privileges, would eliminate this shortcoming.

III. LICENSE STRUCTURE REVISED

In order to provide privileges commensurate with the licensee's area of interest, I propose the three license classes be organized as follows:

The Technician class license will include all licensees that have passed the current element 2 written examination or its successors. Privileges will include all the phone, image, CW, and data privileges given to the current Technician licensee with Morse code credit. The FCC does not track Morse code credit in conjunction with Technician licensees, so this change will be easy to implement (there will be no need for 'paper upgrades').

The General class licensee will receive all HF **phone and image** privileges currently given to Extra class licensees for passing the written element 3 examination. No additional CW/data privileges above those granted to the Technician licensee will be granted. The written examination will need to be altered somewhat from its current form, most likely to increase its difficulty somewhat, but changing the examination will not pose a burden. Questions currently on the Extra class element 4 examination may be added to the General class examination. Current General class licensees will gain the additional phone privileges without any additional paperwork.

The Extra class licensee will gain all HF CW/Digital privileges by passing the current element 1 Morse code examination. No additional written exam will be required of the Extra class licensee. Current Extra class licensees will retain their current privileges as they are the same as the proposed. Current General class licensees will be able to upgrade to Extra class by showing they held a General class license before the date of the change.

IV. SUMMARY

The current Notice proposing elimination of Morse code for all classes of amateur radio license will most likely result in growth within the hobby by removing a barrier to HF access considered elitist and archaic by a great number of licensees. Ironically, it proposes granting vast **CW/Data only** privileges to people interested primarily in voice communications. Granting vast voice/image privileges (and minimal CW/Digital privileges) to persons not having passed a Morse code examination, and

granting additional CW/Digital privileges to those who have, is a better alternative.

Respectfully submitted,

K9VIC

Donald E. Dallmann,

229 S. River Rd.
Plainfield, IL 60544